

Document Page 1 of 1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Case No.: 20-21863-GLT
)
Gail Y. Ford,) Chapter 13
)
Debtor.) Related to Doc # ; Claim #7
)
PNC BANK, N.A.,)
) Document # _____
Movant,)
)
v.)
)
Gail Y. Ford and)
WINNECOUR, Ch. 13 Trustee,)
)
Respondents.)

DECLARATION IN RESPONSE TO NOTICE OF MORTGAGE PAYMENT CHANGE

AND NOW comes the Debtor, Gail Y. Ford, by and through her undersigned counsel, Dennis J. Spyra, Esq., and files the within Declaration in Response to Notice of Mortgage Payment Change, and in support thereof, avers as follows:

1. The undersigned has reviewed the Notice of Mortgage Payment Change filed by PNC Bank, N.A., (hereinafter “PNC Bank”) at Claim #7 as filed in this case, and has determined that the estate will not be adversely affected if the mortgage payment change as requested by the Bank is as allowed, **since this payment is lower than the amount allotted to PNC Bank under the Plan.**
2. The new post-petition monthly mortgage payment of \$150.84, as requested by the Bank, is effective November 1, 2021, as per Notice of Modification filed by the Bank on October 6, 2021.

WHEREFORE, the Debtor ask this Court to allow the payment change as requested by the Bank at Claim #7 in the above-styled case and, and to grant such other and further relief as deemed necessary in furtherance of this matter.

Respectfully submitted,
/S/ DENNIS J. SPYRA, ESQ.
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